

REMARKS

Claims 1-20 are pending. Claims 5 and 6 have been withdrawn from consideration. Claims 1-4 and 7-20 are rejected. Claims 7, 8 and 19 are cancelled and claims 1-4, 9-18 and 20 amended. Support for the amendments can be found throughout the application, for instance in the specification and claims as originally filed. No new matter is added. Applicant respectfully requests reconsideration and withdrawal of all rejections.

Election/Restriction

Applicant wished to acknowledge the election of Figures 1-5b with respect to the means for attaching the handle or broom stick, as discussed in the response filed January 27, 2003.

Drawings

The drawings are objected to. Applicant respectfully points out that a Request for Approval of Drawing Corrections is submitted herewith.

Applicant notes that Figures 4 and Figures 5 have been redrawn as Figures 4-1 and 4-2 and Figures 5-a1 and 5-a2, respectively.

Also, in Figure 1, a piece of textile is referenced by numeral 38. The holes opposite toes are referenced by numeral 36, as in Figure 5b. Figure 11 shows the cut-out portion 31 of the strip 11. While one central window 9 is shown in Figure 1, Applicant urges that those of ordinary skill in the art would recognize that it is possible to have two adjacent central windows 9. See e.g., page 6, lines 35-36 of the

- Check to
add fig 4-1
in spec -

specification. With respect to press stud systems, Applicant points out that both claims 1 and 17 require holes 16 suitable for press stud systems for fixing clips rather than actual press stud systems.

Finally, with regard to reference numerals 15 and 22, Applicant points out that the drawings are correct. Applicant will consider filing a supplemental amendment so that "toes 22" is referred to as some term other than "toes".

Applicant therefore urges withdrawal of all objections to the drawings.

Specification

The Abstract is objected to for being three paragraphs in length. Applicant respectfully points out that the objection is moot in view of the amendments to the Abstract as indicated herein.

Claim Objections

Claims 1, 9, 11 and 13 are objected to for informalities. Applicant respectfully submits that the objection is moot in view of the claim amendments indicated herein. Applicant urges withdrawal of all objections.

Claim Rejections - 35 U.S.C. 112

Claims 1-4 and 7-20 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite. Applicant respectfully urges that the objection is moot in view of the claim amendments indicated herein.

Regarding claim 10, Applicant would like to point out that a “shaped strip” is well described throughout the specification, for example the paragraph spanning pages 3-4 of the specification. No change in claim scope is intended by the amendment.

With respect to claim 13, including the phrase “that two rigid levers extend into a portion of the strip and bear, via a rib, on the upper face of the plate”, Applicant would like to point out that those of ordinary skill in the art reviewing the application as a whole would clearly understand the claimed invention. Indeed, with reference to Figures 10a and 11, the paragraph spanning pages 6-7 of the specification clearly explains claim 13.

Regarding claim 16, Applicant notes that in claim 10, upon which claim 16 depends, the “shaped strip” is adequately described as the “clamping mechanism” of the invention.

Regarding claim 20, Applicant submits that those of ordinary skill would understand the claimed invention when reviewing the application as a whole. For example, the specification at page 5, line 35 to page 6, line 22 describes how “fixing clips” may be used in the claimed invention. Accordingly, the specification continues to describe how holes 16, may similarly serve to “clip” a sponge support 30 under the lower base 6 of the plate. The support being “clipped into the holes” would thus be considered quite clear to those of ordinary skill in the art.

Applicant urges that all claims are clear and definite.

Claim Rejections - 35 U.S.C. 102

Claims 1, 7-9 and 17-20 are rejected under 35 U.S.C. 102(b) as being anticipated by Krajicek (U.S. Patent No. 4,852,210).

Claims 1 and 10 are rejected under 35 U.S.C. 102(b) as being anticipated by Thomas (U.S. Patent No. 3,465,377).

Claim 1 is rejected under 35 U.S.C. 102(b) as being anticipated by Garcia (U.S. Patent No. 5,419,015).

Claims 1 and 10-15 are rejected under 35 U.S.C. 102(e) as being anticipated by Petner (U.S. Patent No. 5,915,437).

It is alleged that each of the cited references disclose each and every element of the claimed invention of those particular claims.

Applicant respectfully disagrees. The present invention as set forth in claim 1 is concerned with a multifunction plate for a surface cleaner, comprising a plate of a rectangular shape, provided with gripping and manipulating means, as well as with means for securing pieces of textile, characterised in that said gripping and manipulating means, between the broom-stick or the holding handle and a central rod connected to the plate, are interchangeable, and in that there are a plurality of means for fixing different types of pieces of textile to the plate, said means being at least one of the following: on the lower base of the plate, plane portions for self-gripping strips; on the upper face of the plate, at least clamping mechanisms co-operating with windows or cavities in the plate to hold the types of pieces of textile having turned-back edges, and holes suitable for press stud systems for fixing clips.

Krajicek discloses a wet mop comprising a handle 1 which is pivotally connected to a plate 9 by universal joint 3 (col. 2, lines 25-42). With reference to Figures 1-8, the plate is a flat, rigid structure having shoulders 11 integrally molded on the top side (col. 2, lines 55-56). Holes 21 are drilled in the plate 9 to accommodate foundation 22 of a

pad gripper 20 (col. 3, lines 12-13). The foundation 22 comprises a shank with a flat base (col. 3, lines 14-15). Pad grippers 20 have downwardly extending bristles 23 to engage scrubbing pad 19 (col. 3, lines 19-21). Instead of a scrubbing pad 19, a cloth wipe 216 may be wrapped over the perimeter of the plate, and an elastic band 27 wrapped around the perimeter to draw the cloth wipe 26 taught (col. 3, lines 46-54).

Thomas discloses a floor cleaning mop having a handle 2, a swivel 3 and a connecting plate 4 attaching the handle to a base 1 (col. 2, lines 21-22). The mop base 1 is designed to receive a wiper 6 (col. 2, line 26). With reference to Figures 1 and 4-5, Thomas discloses that for fastening the wiper 6 to the base, suitable clamps may be provided as indicated by 17, 18 (col. 3, lines 6-13).

Garcia discloses a mop including a mop head 20, a mop handle 21, and a work pad 31 (col. 2, lines 28-30). With reference to Figures 1-2, Garcia discloses that a hub 41 and the lower end of the handle 21 are joined via a universal joint means 25 (col. 2, lines 43-45). The universal joint means include an upper pivot pin or shaft 29 and a lower pivot pin or shaft 30 (col. 2, lines 45-46). Any universal joint structure may be used to join handle 21 to support plate 22 (col. 2, lines 50-51). The bottom surface of the support plate 22 is a flat planar surface against which work pad 31 is fastened (col. 2, lines 52-56).

Petner discloses a dust mop comprising a handle 2 connected to a mop head 3 which comprises base 4 (col. 2, lines 12-14). With reference to Figures 1-5, Petner discloses the base 4 as attached to support pad 5 by conventional means mob bonnet 6 (col. 2, lines 13-22). Clips 9 are secured to base 4 by dual attachment tabs 18 and 19,

through base openings 20 and 21, wherein tabs 22 and 23 rest within base openings 24 and 25 (col. 2, lines 23-40).

Applicant therefore urges that no combination of the cited references is able to teach or suggest the claimed invention. Applicant notes in particular that none of the cited references teach or suggest that a “gripping and manipulating means, between, the broom stick or the holding handle and, a central rod connected to the plate, are interchangeable,” as claimed. Indeed, for each of the cited references, the Patent Office appears to be of the opinion that the disclosed handle is a “gripping and manipulation means” according to the claimed invention. This is incorrect. In that the “gripping and manipulating means” of the claimed invention are between the broom stick/holding handle and a central rod, in the claimed invention, the “gripping and manipulating means” must be something other than the broom stick/handle.

For example, the Office Action cites the handle 1 of Krajicek as a “gripping and manipulating means” according to the claimed invention. See Figure 1 of Krajicek. This is clearly incorrect, since this handle 1 cannot be between itself and a central rod, as discussed above. Moreover, although the universal joint of Figures 3-4 might be characterized as a “gripping and manipulating means” as claimed (See col. 2, lines 25-41), Krajicek contains no teaching or suggestion that the universal joint may be interchangeable, as is also required by the claimed invention. Although page 10 of the Office Action indicates that the handle 1 is interchangeable, Applicant again submits that such a handle is not a “gripping and manipulating means” according to the claimed invention.

The Office Action cites the handle 2 of Thomas as a "gripping and manipulating means" according to the claimed invention. See Figure 1 of Thomas. However, as discussed above, such a handle may not constitute the "gripping and manipulating means" of the claimed invention. Although Thomas discloses a swivel 3 that appears to be between the handle 2 and a connecting plate 4 (See col. 2, lines 19-22; see *also* Figure 1), the reference contains no teaching or suggestion that such a swivel may be "interchangeable", as in the claimed invention.

The Office Action also cites the mop handle 21 of Garcia as a "gripping and manipulating means" according to the claimed invention. See Figures 1-2 of Garcia. This is incorrect, however, as discussed above. Moreover, the Garcia reference contains no teaching or suggestion of any "gripping and manipulating means" that are interchangeable", even though the reference discloses a universal joint means 25 for joining the handle 21 and hub 41. See col. 2, lines 19-22; see *also* Figures 1-2.

Finally, the Office Action cites the handle 2 of Petner as a "gripping and manipulating means" according to the claimed invention. See Figure 1 of Petner. As discussed above, a mere handle cannot be a "gripping and manipulating means" as claimed. In addition, Petner appears to contain absolutely no teaching or suggestion of any other feature that might be considered a "gripping and manipulating means" between the handle and a central rod, much less "gripping and manipulating means" that are "interchangeable", as claimed. Moreover, Applicant would like to point out that this application has a priority date of December 19, 1997, which is well before the March 31, 1998 U.S. filing date of Petner. Therefore, even though the above remarks should

be enough to distinguish Petner from the claimed invention, a verified translation of the priority papers can be provided if the Patent Office so desires.

Therefore, in that none of the cited references teach or suggest each and every element of the claimed invention, all rejections should be withdrawn.

Claim Rejections - 35 U.S.C. 103

Claims 2-4 are rejected under 35 U.S.C. 103(a) as being obvious over Krajicek in view of Nichols et al. (U.S. Patent No. 4,642,837). It is alleged that while Krajicek does not include two flexible strips on a joint for the attachment between the joint and handle, it would have been obvious to modify the attachment between the joint and handle of Krajicek to substitute the one of Nichols, to provide flexible quick strips and a flexible quick release handle and joint connection.

Applicant respectfully disagrees. The present invention is discussed above.

Krajicek is discussed above.

Nichols et al. is cited as disclosing a broom having interlocking components. With reference to Figures 1 and 4, Nichols et al. discloses a broom assembly including a broom shroud 7 and a handle socket 9, wherein the broom shroud has inwardly angled gripping fingers 31. See e.g., col. 3, lines 7-17 of Nichols et al.

Applicant again points out that, as discussed above, Krajicek fails to teach or suggest any "gripping and manipulating means", as required by the claimed invention. Moreover, Nichols et al. also fails to teach or suggest that "gripping and manipulating means, between, the broom stick or the holding handle and, a central rod connected to the plate, are interchangeable," as claimed. In other words, Nichols et al. is unable to

cure the deficiencies of Krajicek. Therefore, in that no combination of the cited references is able to teach or suggest each and every element of the claimed invention, the rejection should be withdrawn.

In view of the amendments and remarks above, Applicant submits that this application is in condition for allowance and request favorable action thereon.

In the event this paper is not timely filed, Applicant hereby petitions for an appropriate extension of time. The fee for this extension may be charged to our Deposit Account No. 01-2300, along with any other additional fees which may be required with respect to this paper, refereeing Attorney Docket No. 100210-00001.

Respectfully submitted,
ARENT FOX KINTNER PLOTKIN & KAHN, PLLC



Hans J. Crosby
Attorney for Applicants
Registration No. 44,634

Customer No. **004372**
1050 Connecticut Avenue, N.W., Suite 400
Washington, D.C. 20036-5339
Tel: (202) 857-6000
Fax: (202) 638-4810

HJC/ccd